

*[Submitting Counsel on Signature Page]*

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

No. 4:22-MD-3047

MDL No. 3047

This Document Relates to:  
  
ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~  
ORDER GOVERNING PLAINTIFFS'  
RESPONSES TO DEFENDANTS' FIRST  
SET OF REQUESTS FOR  
PRODUCTION NOS. 32, 33, 34, AND 66**

On August 8, 2024, the Court heard argument on the Parties' Joint Letter Brief Regarding Plaintiffs' Responses to Defendants' Requests for Production (ECF No. 1051). The Court hereby ORDERS as follows:

Plaintiffs shall produce documents responsive to the following requests, limited to the Relevant Time Period, as defined in Defendants' First Set of Requests for Production:

32. All DOCUMENTS RELATING TO any criminal investigation or proceeding involving YOU or YOUR biological parent, step-parent, legal guardian, or anyone with whom YOU resided, either part-time or full-time, during the Relevant Time Period, as a suspect, defendant, respondent, victim, complainant, and/or witness, INCLUDING police records, sworn statements, juvenile justice records, criminal justice records, arrest records, court proceedings, transcripts, conviction records, sentencing records, bail records, and supervision records.

33. All DOCUMENTS RELATING TO any civil family court, juvenile court, neglect, truancy, divorce, or foreclosure proceeding or investigation involving YOU or YOUR biological parent, step-parent, legal guardian, or anyone with whom YOU resided, either part-time or full-time, during the RELEVANT TIME PERIOD, INCLUDING any prior sworn testimony by YOU.

34. All DOCUMENTS RELATING TO any interaction with child protective services, child and family services, foster care, adoption, or any other similar child welfare agency or organization RELATING TO YOU or YOUR biological parent, step-parent, legal guardian, or anyone with whom YOU resided, either part-time or full-time, during the Relevant Time Period.

66. All DOCUMENTS RELATING TO any break ups that (1) YOU have experienced with a boyfriend, girlfriend, significant other, or other romantic partner, with whom you were in a relationship of six months or longer, or (2) YOU discussed with a medical or mental health provider.

In response to these Requests for Production, Plaintiffs shall produce Known Responsive Documents pursuant to Paragraph 7 of the Order Governing Production of Electronically Stored Information and Hard Copy Documents and shall run search terms, to be agreed by the Parties, across the custodial sources from which documents are being produced for the remaining Requests, including Routine Devices as defined in Discovery Management Order 8.

By Wednesday, August 14, 2024, Plaintiffs shall inform Defendants which bellwether Plaintiffs were involved in breakups resulting from relationships that meet the criteria of revised Request No. 66 set out above, so that case-specific search terms can be crafted.

Dated: August 12, 2024

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**IT IS SO ORDERED** that the foregoing Stipulation is approved.

DATED: August 13, 2024

  
\_\_\_\_\_  
HONORABLE PETER H. KANG  
United States Magistrate Judge

**ATTESTATION**

I, Gregory L. Halperin, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 12, 2024

/s/ Gregory L. Halperin

Gregory L. Halperin